

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

PAUL HARRIS, (330310), *Plaintiff*,

TERRENCE G. BERG

Case No: 20-10065

**DISTRICT JUDGE** 

MAGISTRATE JUDGE PATRICIA T. MORRIS

V

MARY GRENIER,

Defendant.



Paul Harris brought this prisoner civil rights action against Mary Greiner who is an employee of Corizon Health - a healthcare provider formerly contracted by the MDOC. (ECF No. 10, PageID.54). Counsel for Greiner Moved to withdraw as her attorney, fearing that a recent bankruptcy petition filed by Corizon, who has agreed to indemnify Greiner, may present a conflict of interest. (ECF No. 23).

A stay in proceedings will prejudice the Plaintiff in this case, due to the fact that this is regarding a medical need. The nonmoving "party has a right to a determination of its rights and liabilities without undue delay." *Ohio Envtl. Council* v *United States Dist. Ct.*, 565 F.2d 393, 396 (6<sup>th</sup> Cir. 1977).

A delay in the proceedings of this case will cause the Plaintiff further physical harm as he is still without the medical detail that the Defendant denied him. Mr. Harris has an interest in litigating his claims "without undue delay," being the Plaintiff and the person affected by the Defendants actions any stay will be prejudicial. *Ohio Envt'l Council*, 565 F.2d at 396.

Plaintiff prays this court will not grant any further delays in his case.

Respectfully Submitted,

Paul Harris (330310)

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

| PAUL HARRIS, (330310),  Plaintiff,        | Case No: 20-10065   |
|---|---|
|   | DISTRICT JUDGE TERRENCE G. BERG<br>MAGISTRATE JUDGE PATRICIA T. MORRI |
| v   | MANGIOTICITE CON CONTROLL IN MANGIOTIC                                |
| MARY GRENIER,                             |   |
| Defendant.                                | 1   |
| Paul Harris, (330310)                     | <del>'</del>  |
| Petitioner in propria persona             |   |
| Dana Nessel (P51346),                     |   |
| Michigan Attorney General                 |   |
| Attorney for Respondent                   | <del></del>   |
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| STATE OF MICHIGAN )                       | ,   |
| ) s                                       | os.   |
| COUNTY OF GRATIOT )                       | •   |
|   | ,   |
| Paul Harris, being first duly s           | sworn, says that on April <u></u> , 2023, he mailed by                |
| first class mail a copy of Plaintiffs fir | rst Interrogatories, and Request for Production,                      |
| Response to Motion for 120 Day Stay       | y:  |
| Ian T. Cross                              | Nicholas Pillow   |
| Laurence H. Margolis PC                   | Chapman Law Group   |
| 214 S. Main Street, Suite 200             | 1441 West Long Lake Rd., Suite 310                                    |
| Ann Arbor, MI 48104                       | Troy, MI 48098  |
|   | Paul Harris (330310)  |

